

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 477 & 478

**CERTIFICATION OF COUNSEL REGARDING OMNIBUS ORDER (I)
AUTHORIZING THE DEBTORS TO (A) REJECT CERTAIN UNEXPIRED LEASES
EFFECTIVE AS OF OCTOBER 31, 2024 AND (B) ABANDON CERTAIN PERSONAL
PROPERTY AND (II) GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On October 9, 2024, the Court entered an *Order (I) Authorizing Debtors to Reject Certain Unexpired Leases of Nonresidential Real Property and (II) Authorizing and Establishing Procedures to Reject Executory Contracts and Unexpired Leases* (D.I. 461) (the “**Lease Rejection Procedures Order**”).

2. Pursuant to the Lease Rejection Procedures Order, on October 10, 2024, the Debtors filed the *First Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases (and the Abandonment of Property)* (D.I. 477) (the “**First Rejection Notice**”) and the

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Second Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases (and the Abandonment of Property) (D.I. 478) (together, the “**Rejection Notices**”).

3. The deadline to object to each of the Rejection Notices was October 24, 2023, at 4:00 p.m. (ET). Prior to the objection deadline, the Debtors received informal comments from certain landlords (the “**Landlords**”) to the proposed forms of order approving the Rejection Notices. In addition, Ceres Marketplace Investors, LLC, landlord for Store Number 4773 filed an objection to the First Rejection Notice (D.I. 626). The Debtors have removed the lease associated with Store Number 4773 from the schedule of rejected leases, without prejudice, and the objection is therefore moot.

4. Attached hereto as **Exhibit A** is a proposed form of omnibus order approving both of the Rejection Notices and authorizing the Debtors to reject certain unexpired leases effective as of October 31, 2024. The Debtors have confirmed that the attached proposed order resolves the Landlords’ informal comments.

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WHEREFORE, the Debtors respectfully request that the Court enter the order attached hereto as **Exhibit A** at its earliest convenience.

Dated: October 31, 2024
Wilmington, Delaware

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